

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 4 - 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 92-237

In the Matter of)
)
Administration of the)
North American Numbering Plan)
Carrier Identification Codes (CICs))

**COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION
IN SUPPORT OF BELL SOUTH'S PETITION FOR CLARIFICATION**

MCI Communications Corporation, (MCI) by counsel, pursuant to 47 C.F.R. § 1.106, hereby submits these comments in support of the Petition For Clarification (Petition) filed by BellSouth Corporation (BellSouth) on November 23, 1997. In its Petition, BellSouth asks the Federal Communications Commission (Commission) to clarify its order extending the time period during which 3- and 4-digit carrier identification codes (CICs) may be used.¹ Specifically, BellSouth requests that the Commission clarify that local exchange carriers (LECs) may begin phased implementation of three-digit CIC blocking on July 1, 1998. For the reasons set forth below, MCI agrees with BellSouth that the Commission should clarify the CIC Reconsideration Order consistent with BellSouth's request, on the condition that BellSouth and other similarly situated carriers be required to publicly disclose their pre-implementation and quality control plans.

¹ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Order on Reconsideration, Order on Application For Review, and Second Further Notice of Proposed Rulemaking and Order (October 22, 1997) (CIC Reconsideration Order).

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BellSouth's Petition advises that blocking the use of 3-digit CICs in BellSouth's switches can only be accomplished using a phased approach, which BellSouth estimates will take two months.² As a result, BellSouth states that it must begin to reject 3-digit CICs two months before the date upon which the Commission has ordered the elimination of 3-digit CICs. BellSouth's Petition points out that if the Commission's CIC Reconsideration Order is interpreted to prohibit the use of 3-digit CICs under any circumstances beginning on July 1, 1998, BellSouth will be forced to reject 3-digit CICs in some of its switches a full two months before June 30, 1998.³

BellSouth notes that if the Commission fails to clarify the CIC Reconsideration Order to allow BellSouth to begin phased implementation on July 1, 1998, it will frustrate the permissive dialing period and complicate interexchange carrier (IXC) efforts to educate customers regarding the date upon which 4-digit CICs must be used.⁴ BellSouth thus requests that the Commission clarify that its CIC Reconsideration Order is not intended to have this disruptive effect, and that BellSouth may begin phased implementation on July 1, 1998, instead of on May 1, 1998,⁵ in order to allow for the two months necessary to reconfigure its switches.

² BellSouth Petition, p. 2.

³ *Id.*

⁴ *Id.*, p.3

⁵ MCI is aware through industry group meetings that several Regional Bell Operating Companies have been generally opposed to any flash cut from 3-digit to 4-digit CICs. Indeed, BellSouth cannot possibly flush-out each and every BellSouth switch. See BellSouth Petition, p.2 n.5. MCI therefore requests that, if the Commission allows BellSouth's phased implementation to commence on July 1, 1998, it should clarify that all LECs that must use a phased implementation approach may initiate their switch changes on July 1 as well. Such clarification will further the Commission's goal of promoting an efficient nationwide communication service.

I. DENIAL OF BELL SOUTH'S PETITION WOULD RENDER MEANINGLESS THE COMMISSION'S EXTENSION OF THE TRANSITION PERIOD FOR A FULL TWO MONTHS.

In the CIC Reconsideration Order, the Commission stated that by extending the transition period, it "intended to ensure the orderly transition from three to four-digit CICs and to ensure the nondiscriminatory treatment of all CIC holders."⁶ It further stated that consumers' inability to access services during the transition period "would be contrary to the pro-competitive goals of the 1996 Act."⁷ Based on these principles, the Commission extended the period during which 3- and 4-digit CICs may be used until June 30, 1998, and LECs must continue to accept 3-digit CICs until that time. If, as BellSouth states, it must phase implementation in its switches over a two-month period, it will necessarily begin blocking 3-digit CICs prior to June 30 in violation of the Commission's CIC Reconsideration Order. This will result in thousands of consumers being denied the benefits of using 3-digit CICs for two months, thus rendering meaningless the Commission's extension for this two-month time period. Additionally, IXC's such as MCI would be denied the full promise of the additional time ordered by the Commission to reconfigure their networks and notify their customers of the new dialing pattern.

If BellSouth is not allowed to phase implementation beginning on July 1, the effect will be partial nullification of the extended transition period for thousands of consumers and IXC's in BellSouth's territory. Extension of the transition period by the Commission was clearly designed to provide the industry with an additional six months to reconfigure networks and educate consumers. The Commission should not now

⁶ CIC Reconsideration Order, ¶ 91.

reverse itself by forcing LECs like BellSouth to take actions that shorten the transition period. Rather, the Commission should clarify that if a LEC requires a certain period of time to phase in the transition from 3- to 4-digit CICs, it should be allowed to do so, beginning on July 1, so as not to eviscerate the Commission's extended transition period.

II. IF THE COMMISSION GRANTS BELL SOUTH'S PETITION, IT SHOULD REQUIRE BELL SOUTH, AND ANY SIMILARLY SITUATED LEC, TO DISCLOSE ITS IMPLEMENTATION PLANS.

In the CIC Reconsideration Order, the Commission recognized the need to "give IXCs the time they need to coordinate the conversion with LECs, and to prepare their networks and educate their customers about necessary dialing changes."⁸ These coordination efforts are already underway, and industry participants meet regularly to discuss the many details associated with accomplishing a smooth and orderly transition to 4-digit CIC dialing, with as little customer confusion as possible.

If the Commission allows phased implementation by LECs, it will be extremely important to also require that LECs make public their pre-implementation and quality control plans. If a LEC is able to implement blocking of 3-digit CICs without providing advance notice of which end offices will be reconfigured, and on what date, MCI will be at a considerable competitive disadvantage and will be unable to effect its own network reconfigurations and customer education efforts in a seamless fashion.

MCI asks that the Commission require that all LECs planning phased implementation in their switches be required to disclose their pre-implementation and

⁷ *Id.*, ¶ 21.

⁸ CIC Reconsideration Order, ¶ 25.

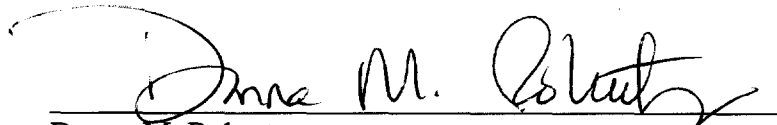
quality control plans. This includes those LECs that have received extensions of time to upgrade their switches to accept 4-digit CICs.⁹

The LECs' pre-implementation and quality control plans should contain, at a minimum, the following: (1) weekly updates of plans to reconfigure LEC end offices, at least 60 days in advance of the date upon which the LEC intends to reconfigure that end office; (2) weekly updates on each LECs' reconfiguration plans, and whether those plans were met, and, if not, why not; and (3) weekly updates describing any changes to reconfiguration plans and the reasons for those changes. Disclosure of this information will encourage the coordinated conversion from 3- to 4-digit dialing that is contemplated by the Commission's CIC Reconsideration Order.

WHEREFORE, for the foregoing reasons, MCI requests that the Commission grant BellSouth's Petition, on the condition that BellSouth and other similarly situated LECs publicly disclose their pre-implementation and quality control plans as described herein.

Respectfully submitted,

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December 4, 1997

⁹ See Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Order (December 3, 1997) (granting several LECs' petitions for extension of time to complete switch changes to recognize 4-digit CICs).

CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing Comments of MCI on the Matter of the Administration of the North American Numbering Plan Carrier Identification Codes (CICs) were sent, on this 4th day of December, 1997, via first-class mail, postage pre-paid, to the following:

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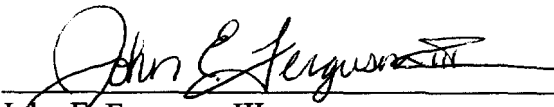
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